

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware  
corporation; AMAZON.COM SERVICES  
LLC, a Delaware limited liability company;  
LIFESCAN, INC., a California corporation;  
and LIFESCAN IP HOLDINGS, LLC, a  
Delaware limited liability company,

Plaintiff,

v.

VIKAS GOYAL, an individual; SNEHA  
SAXENA, an individual; RAJENDRA  
KUMAR AGARWAL, an individual;  
ANSHITA GOSWAMI, an individual;  
ANINDIYA RAI, an individual; RAJANI  
DEVI, an individual; KAMAL KUMAR  
ANAND, an individual; VIVEK GUPTA, an  
individual; STRIP POINT LLC, a Colorado  
limited liability company; VIKASH  
ENTERPRISES, a foreign company; A S  
HOMES, a foreign company; VOVOA PVT  
LTD., a foreign company; SPARK  
ENTERPRISES, a foreign company; LUCID  
QUEST LIMITED, a foreign company;  
DHANLAXMI TRANSPORT COMPANY, a  
foreign company; and DOES 1-10,

Defendants.

Case No.: 2:24-cv-00880-RSM

**STIPULATION AND ORDER TO  
EXTEND THE TIME FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFFS' COMPLAINT**

**NOTE ON MOTION CALENDAR:  
Friday, March 21, 2025**

1 Plaintiffs Amazon.com, Inc, Amazon.com Services LLC, Lifescan, Inc., and Lifescan  
2 IP Holdings, LLC, (“Plaintiffs”) and Defendants Vikas Goyal, Sneha Saxena, Rajendra Kumar  
3 Agarwal, Anshita Goswami, Rajani Devi, Strip Point LLC, Vikash Enterprises, A S Homes,  
4 Vovoa Pvt Ltd., Spark Enterprises, and Dhanlaxmi Transport Company (collectively,  
5 “Defendants”; Plaintiffs and Defendants, collectively, the “Parties”), by and through their  
6 counsel of record, respectfully submit this Stipulation—and respectfully request that the Court  
7 enter the subjoined proposed order—to extend the time for Defendants to respond to Plaintiffs’  
8 Complaint.

9 1. WHEREAS, on June 20, 2024, Plaintiffs filed the Complaint against Defendants  
10 in the above-captioned action [Dkt. No. 1].

11 2. WHEREAS, on September 25, 2024, a Certificate of Service was filed showing  
12 service of Summons, Complaint and Exhibits, and Civil Cover Sheet to Defendant Strip Point  
13 [Dkt. No. 9].

14 3. WHEREAS, on November 19, 2024 a Certificate of Service was filed showing  
15 service of Summons, Complaint and Exhibits, and Civil Cover Sheet to Defendant Vovoa Pvt  
16 Ltd. [Dkt. No. 19].

17 4. WHEREAS, on November 19, 2024 a Certificate of Service was filed showing  
18 service of Summons, Complaint and Exhibits, and Civil Cover Sheet to Defendant Dhanlaxmi  
19 Transport Company [Dkt. No. 20].

20 5. WHEREAS, on February 28, 2025, Defendant Vikash Enterprises signed a  
21 Waiver of the Service of Summons [Dkt. No. 23].

22 6. WHEREAS, on February 28, 2025, Defendant Vikash Goyal signed a Waiver  
23 of the Service of Summons [Dkt. No. 24].

24 7. WHEREAS, on February 28, 2025, Defendant Spark Enterprises signed a  
25 Waiver of the Service of Summons [Dkt. No. 25].  
26

1           8.       WHEREAS, on February 28, 2025, Defendant Sneha Saxena signed a Waiver  
2 of the Service of Summons [Dkt. No. 26].

3           9.       WHEREAS, on February 28, 2025, Defendant Rajendra Kumar Agarwal signed  
4 a Waiver of the Service of Summons [Dkt. No. 27].

5           10.      WHEREAS, on February 28, 2025, Defendant Rajani Devi signed a Waiver of  
6 the Service of Summons [Dkt. No. 28].

7           11.      WHEREAS, on February 28, 2025, Defendant Anshita Goswami signed a  
8 Waiver of the Service of Summons [Dkt. No. 29].

9           12.      WHEREAS, on February 28, 2025, Defendant A S Homes signed a Waiver of  
10 the Service of Summons [Dkt. No. 30].

11          13.      WHEREAS, Defendants' response to Plaintiffs' Complaint was due on January  
12 21, 2025 and extended per email agreement between the Parties to March 20, 2025.

13          14.      WHEREAS, the Parties have been working cooperatively regarding the early  
14 stages of the litigation and are engaged in substantial discussions of the matters at issue in this  
15 dispute; and the Parties believe a 30-day extension of Defendants' deadline to respond to the  
16 Complaint will further accommodate those discussions.

17          15.      WHEREAS, this is the first request for an extension of time for Defendants to  
18 respond to the Complaint in this matter, and the requested extension is made in good faith and  
19 not for the purpose of delay or other procedural advantage.

20          16.      ACCORDINGLY, the Parties stipulate and respectfully request to extend  
21 Defendants' deadline to respond to Plaintiffs' Complaint to April 21, 2025. A proposed order  
22 is subjoined herewith.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD, on this 21st day of March, 2025.

**BUCHALTER  
A Professional Corporation**

By:s/Michelle Q. Pham  
Michelle Q. Pham, WSBA #44286

1420 Fifth Avenue, Suite 3100  
Seattle, WA 98101-1337  
Email: mphan@buchalter.com  
Telephone: 206.319.7052

*Attorneys for Defendants Vikas Goyal,  
Sneha Saxena, Rajendra Kumar Agarwal,  
Anshita Goswami, Rajani Devi, Strip Point  
LLC, Vikash Enterprises, A S Homes, Vovoa  
Pvt Ltd., Spark Enterprises, and Dhanlaxmi  
Transport Company*

**DAVIS WRIGHT TREMAINE LLP**

By:s/Lauren Rainwater  
Lauren Rainwater, WSBA #43625

920 Fifth Avenue, Suite 3300  
Seattle, WA 98104  
Email: laurenrainwater@dwt.com  
Tel: (206) 623-3150

*Attorneys for Plaintiffs*

**ORDER**

**PURSUANT TO THE STIPULATION, IT IS SO ORDERED** that Defendants' deadline to respond to Plaintiffs' Complaint is extended to April 21, 2025.

DATED this 24<sup>th</sup> day of March, 2025.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE